REMARKS

In the Office Action mailed December 4. 2006, the Examiner noted that claims 1-15 were pending and rejected all claims. No claims have been amended, and, thus, claims 1-15 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

On page 2 of the Office Action, the Examiner rejected claims 1-9 and 11-14 under 35 U.S.C. § 102 as anticipated by Wang. Page 7 of the Office Action rejects claims 10 and 15 under 35 U.S.C. § 103 over Wang and AutoCAD.

With respect to claim 1, starting on page 2 of the Action, the Examiner points to figures 5, 6 and 7 and reference numbers 92-94 of Wang. In summary, Wang discusses a system in which recommended viewpoints for an object are pre-computed. After the pre-computation, when a user selects an object, the object is viewed at the recommended viewpoints in a pre-computed order. (See Wang at col. 2, line 23-60, col. 4, line 35 - col. 5, line 41, coil. col. 6, lines 52-56, col. 7, lines 35-40, col. 8, lines 12-17, col. 10, line 65 - col. 11, line 11). In summary, Figure 7 shows a sequence for is "passing" through the recommended views. That is, Wang does not allow the selection of a view only the selection of an object. Claim 1 emphasizes that the view is selected by selecting one of the view direction controls ("view direction controls ... causing a display view of three-dimensional scene to change to the corresponding view when selected"). This is very different from Wang.

More particularly, Wang describes a series of algorithms ("means") for positioning a viewpoint based on authored preferred view directions. The user selects an object, and the system will move the camera to a good position that shows both the object and any attached information, so that neither is obscured. Multiple preferred viewing directions can be stored for each object, and the system allows the user to step through those views. Nowhere does Wang make any mention of a user-interface (UI), and there is certainly no mention of any in-scene graphical UI.

The Examiner appears to have incorrectly concluded that there is some relationship between the work of Wang and the claims of the present application. The specific figures the Examiner cites as showing a similar "graphical user interface element" actually show a diagram of the mathematical vector information being used by (or calculated by) the algorithms in the patent. Wang does not say anywhere that the user can see or interact with these diagrams. In fact, just the opposite --- in those figures where Wang shows the final view of the camera (7B,

7D, 7F, 7H) there is no graphical representation of a view control whatsoever. In other words, the Examiner appears to have mistaken an explanatory diagram for a picture of a user interface.

Wang's terminology can be confusing. When Wang speaks of an "in-space viewpoint control device" he is talking about a device that controls your "in-space viewpoint" --- not an in-space control such as is the subject of claim 1.

So, with respect to the 102 rejection, Wang teaches nothing whatsoever about any user interface element. Wang discusses selection, but the method of selection is never mentioned, nor is any visible UI element. There is nothing in Wang that indicates the orientation of a scene.

AutoCAD adds nothing to Wang with respect to the features of claim 1.

Independent claims 9 and 12-15 similarly patentably distinguish over Wang and AutoCAD for similar reasons.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 4 emphasizes "a central core control associated with a perspective view of the scene" along with "axial controls peripherally positioned with respect to the core control, aligned with the axial dimensions of the scene and associated with corresponding front, back, top, bottom, left side and right side views". The prior art does not teach or suggest such. It is submitted that the dependent claims are independently patentable over the prior art.

It is submitted that the claims distinguish over the prior art and withdrawal of the rejection is requested.

It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: <u>March 5, 2007</u>

By: <u>/J. Randall Beckers/</u>
J. Randall Beckers
Registration No. 30,358

1201 New York Avenue, NW, 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501